UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

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§	No. 24-CV-12586
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<u>DEFENDANT MANPREET SINGH KOHLI'S MOTION</u> <u>FOR EXTENSION OF TIME TO RESPOND</u>

Defendant Manpreet Singh Kohli ("Defendant" or "Kohli"), by and through his attorneys, hereby requests an extension of the deadline for filing an answer in the above-captioned action until January 31, 2025. Plaintiff Securities and Exchange Commission ("Plaintiff" or "SEC") consents to the relief requested in this motion. In support of this motion, Defendant states the following:

- 1. Defendant is a resident of the United Kingdom. On November 28, 2024, he was served in the United Kingdom with a copy of the complaint. The deadline for Defendant to file his responsive pleading in this case is December 19, 2024.
- On December 11, 2024, this Court granted Defendant's first motion for an extension of time, thereby making Defendant's pleading responsive to the complaint due on January 13, 2025.
- 3. Defendant now makes a second request for an extension of time to file a responsive pleading, asking for a pleading to be due on January 31, 2025.

- 4. Like before, the defense needs time to evaluate the allegations in the Complaint and discuss with Mr. Kohli as to the best course of action. In addition, the defense has been in communications with the SEC, and are negotiating for a possible review of the evidence by the defense, which could impact what responsive pleading will be filed.
- 5. The Securities and Exchange Commission, through Mr. David D'Addio, consents to this motion.

The undersigned counsel certifies that counsel have met and conferred in accordance with Local Rule 7.1(a)(2) and Plaintiff consents to the extension of time to answer the complaint.

Respectfully submitted,

/s/ Eric S. Rosen Eric S. Rosen DYNAMIS LLP 225 Franklin St., 26th Floor Boston, MA 02110 (646) 541-8484 erosen@dynamisllp.com

CERTIFICATE OF SERVICE

I hereby certify that on January 7, 2025, a true and correct copy of the foregoing document was filed electronically through the Court's ECF/CM system which caused service upon all counsel of record to the email address so designated by them for service.

/s/ Eric S. Rosen Eric S. Rosen DYNAMIS LLP